

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE**

LIBERTY LEGAL FOUNDATION;
JOHN DUMMETT;
LEONARD VOLODARSKY;
CREG MARONEY,

Plaintiffs

CASE NO: 2:12-cv-02143-cgc

v.

NATIONAL DEMOCRATIC PARTY
of the USA, Inc.;
DEMOCRATIC NATIONAL COMMITTEE;
TENNESSEE DEMOCRATIC PARTY;
DEBBIE WASSERMAN SCHULTZ;
CHIP FORRESTER,

Defendants

MOTION FOR PRO HAC VICE ADMISSION

Pursuant to this Court's Local Rule 83, Tennessee attorney Van R. Irion requests this Court's Permission to participate as attorney representing the Plaintiffs in the above-entitled case. Grounds for this motion, as set forth below are that Mr. Irion is a member in good standing of the bar of the state of Tennessee, is qualified to represent the Plaintiff, represented the Plaintiff in the state court action from which this action arises, and will facilitate efficient adjudication of the instant matter.

QUALIFICATIONS

Attorney Irion is licensed to practice law and is a member of in good standing of the bar in the State of Tennessee. A current certificate of good standing from the Supreme Court of Tennessee is attached to this motion. Mr. Irion was admitted to practice law in Tennessee in October 2005 and has been practicing continuously since. He is a resident of Monroe County Tennessee and maintains an office at 9040 Executive Park Drive, Suite 200, Knoxville, Tennessee, 37923. His phone number is (423) 208-9953. His e-mail address is van@libertylegalfoundation.org.

Mr. Irion agrees to behave in accordance with the standards of professional conduct and the duties imposed upon attorneys by this Court's rules.

Mr. Irion is also currently admitted to practice before the United States Supreme Court, the U.S. Court of Appeals for the Sixth Circuit, the U.S. District Court for the Eastern District of Tennessee, and the U.S. Patent and Trademark Office. He was admitted to practice before the U.S. Supreme Court April 30, 2009. The Supreme Court can be reached at (202) 479-3011, One 1st Street N.E., Washington, DC 20543. He was admitted to practice before the U.S. District Court for the Eastern District of Tennessee on April 20, 2007. The Eastern District of Tennessee can be reached at (865) 545-4228, 800 Market Street, Suite 130, Knoxville, TN 37902. He was admitted to practice before the Sixth Circuit on July

28, 2006. The Sixth Circuit can be reached at (513) 564-7000, 540 Potter Stewart U.S. Courthouse, 100 E. Fifth Street, Cincinnati, Ohio 45202-3988. He was admitted to practice before the U.S. Patent and Trademark Office on December 10, 2007. The USPTO can be reached at (571) 272-1000, 401 Dulany Street, Alexandria, VA 22313. He has also appeared pro hac vice before the U.S. District Court for the Eastern District of Virginia, the U.S. District Court for the District of Arizona, U.S. District Court for the Northern District of Texas, the U.S. Bankruptcy Court for the Middle District of Tennessee, and the Georgia of State Administrative Hearings. No court has revoked Mr. Irion's admission. Mr. Irion has never been sanctioned, reprimanded, or held in contempt by any court or bar. No authority has ever brought disciplinary action against Mr. Irion.

Mr. Irion is well qualified to represent the Plaintiff in the instant matter because Mr. Irion has continuously litigated Constitutional matters in numerous Federal and state courts since January 2006. Mr. Irion has dedicated several thousand hours to Constitutional litigation. Also, Mr. Irion was a Republican candidate for Tennessee's 3rd Congressional District seat in 2010, and therefore has intimate knowledge of the election process and political party's interaction with state officials.

Mr. Irion is the Lead Counsel for Liberty Legal Foundation, a non-profit organization dedicated to restoring original meaning to U.S. Constitutional

precedent. Liberty Legal Foundation has over 32,000 members in all 50 states, including U.S. citizens overseas. Liberty Legal Foundation is currently litigating challenges similar to the instant matter in Georgia State Court and Arizona Federal Court.

CONCLUSION

For the reasons set forth herein, Mr. Irion respectfully requests that this Court grant his motion to participate as Plaintiffs' attorney in the above-entitled action.

Respectfully submitted this 7th day of March, 2012.

s/Van R. Irion

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CERTIFICATE OF SERVICE

I certify that I have served the opposing parties' attorney and the Georgia Secretary of State in this matter with a copy of Plaintiff's Motion for Pro Hac Vice Admission by sending a copy via first class U.S. mail to attorney Ben Gastel at 227 Second Ave. N., Fourth Floor Nashville, TN 37061-1631. Copies were also sent via e-mail addressed to: beng@branstetterlaw.com.

This the 7th day of March, 2012.

s/Van R. Irion

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